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December 13, 2023

VIA ECF

Honorable Jessica S. Allen, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King Jr. Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

**Re: *In re Fragrance Direct Purchaser Antitrust Litigation*
Case No. 2:23-cv-02174-WJM-JSA (D.N.J.)**

Dear Judge Allen:

This firm, along with co-counsel, represents direct purchaser plaintiffs in this antitrust matter. The Court's November 21, 2023 Order instructed the parties to meet and confer and submit a stipulation by November 29, 2023, regarding the "deadline by when Defendants must answer, move, or otherwise respond to the anticipated amended consolidated complaint." ECF No. 77 at 2. The Court granted a 14-day extension for the parties in this Action as well as those in the related, *In Re: Fragrance Indirect Purchaser Antitrust Litig.*, Case No. 2:23-cv-03249-WJM-JSA (the "Indirect Purchaser Action") and *In Re: Fragrance End-User Plaintiff Antitrust Litig.*, Case No. 2:23-cv-16127-WJM-JSA (the "End-User Action") to agree to a coordinated schedule across the three related actions (ECF No. 80).

The parties across the three actions were able to agree to a schedule for the filing of a Consolidated Amended Complaint in each action and responses thereto, which is memorialized in the attached Stipulation and Proposed Order.

We have enclosed the Stipulation signed by the parties and proposed form of Order for the Court's convenience. If it is acceptable to the Court, kindly sign the Order and have a "filed" copy returned to the parties in each of the actions, (the Direct Purchaser Action, the Indirect Purchaser Action, and the End-User Action), via the Court's ECF system.

December 13, 2023

Page 2

Thank you for Your Honor's continued attention to this case and we are, of course, available at any time should you have any questions regarding our proposal.

Respectfully submitted,

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/s/James E. Cecchi
JAMES E. CECCHI

Liaison Counsel for Direct Purchaser Plaintiffs